

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IAN BRUCE,

Plaintiff,

v.

WESTLAKE SERVICES, LLC, dba  
WESTLAKE FINANCIAL,

Defendant.

Case No. \_\_\_\_\_

**NOTICE OF REMOVAL**

**TO THE CLERK OF COURT FOR THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN DISTRICT OF GEORGIA:**

PLEASE TAKE NOTICE that under 28 U.S.C. §§ 1331, 1367, 1441, 1446, Defendant Westlake Services, LLC dba Westlake Financial (“Defendant”) hereby removes this action from the Superior Court of Cobb County, Georgia, to the United States District Court for the Northern District of Georgia, Atlanta Division.

In support of this Notice of Removal, Defendant states:

1. The removed case is a civil action filed on September 11, 2024, in the Superior Court of Cobb County, Georgia, styled *Ian Bruce v. Westlake Services, LLC dba Westlake Financial*, No. 24GC06809 on the Superior Court’s docket. *See* Ex. 1, (all process and pleadings served upon Defendant).

### **Federal-Question Jurisdiction & Supplemental Jurisdiction**

2. Plaintiff's claims fall under this Court's jurisdiction under 28 U.S.C. §§ 1331, 1367 because it is a civil action "arising under the . . . laws . . . of the United States" in that at least two of the claims allege violations of federal law, specifically the Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681 *et seq.*, and the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692 *et seq.* (Ex. 1, Compl. ¶¶ 34–39).

3. The state law claims (Ex. 1, Compl. ¶¶ 31–39) are "so related to the claims in the action within [this Court's] original jurisdiction that they form part of the same case or controversy under Article III of the United States Constitution." 28 U.S.C. § 1367(a).

4. The state law claims also fall within this Court's supplemental jurisdiction under 28 U.S.C. § 1367 because they arise "out of a common nucleus of operative facts" with the federal claims. *Harrell v. Bank of Am., N.A.*, 813 F. App'x 397, 400 (11th Cir. 2020) (citing case law).

5. This civil action may be removed to this Court in accordance with 28 U.S.C. § 1441(a), (c)(1) in that this Court has original jurisdiction over the federal claims and supplemental jurisdiction over the state law claims.

6. Removal to this Court is proper under 28 U.S.C. § 1441(a) because this Court is the United States District Court for the district and division within which

the removed state court action was pending.

7. As required by 28 U.S.C. § 1446(a), true and correct copies of all process and pleadings that have been served upon Defendant to date are attached to this Notice. *See* Ex. 2 (copy of the superior court docket as of the date of this Notice).

8. Defendant was served on October 2, 2024, by sheriff's service. *See* Ex. 1, Sheriff's Entry of Service.

9. Defendant is the only defendant that has been joined and served as of the date of this Notice.

### **Procedural Notice**

10. Promptly after filing this Notice with this Court, Defendant will give notice of the removal to all adverse parties and file a copy of the Notice with the Clerk of Court for the Superior Court of Cobb County, Georgia, to effect removal of this action to this Court in conformity with 28 U.S.C. § 1446(d).

Respectfully submitted this 1<sup>st</sup> day of November 2024,

/s/ Danielle E. Douglas

Danielle E. Douglas

(Ga Bar No. 192316)

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*Counsel for Defendant*

### CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of November, 2024, I served a true and correct copy of the foregoing **Notice of Removal** by Certified Mail, Return Receipt, and by electronic mail on the following *pro se* party to this action:

Ian Bruce  
267 Langley Dr. #1267  
Lawrenceville, Georgia 30046  
[ianBruce.me@gmail.com](mailto:ianBruce.me@gmail.com)

/s/ Danielle E. Douglas  
OF COUNSEL